

LAW OFFICES OF JILL R. SHELLOW PLLC

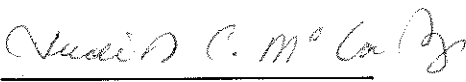
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July 10, 2025

BY ECF AND EMAIL

The Honorable Victoria Reznik
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601
ReznikNYSDChambers@nysd.uscourts.gov

APPLICATION GRANTED


Hon. Judith C. McCarthy 7-11-2025

RE: *United States v. Einstein Brutus*, 25-mj-455 (UA)

Dear Judge Reznik:

I am writing to request a modification of Einstein Brutus' bail conditions. Mr. Brutus is participating in Avenues, an intensive residential drug treatment program in Bucks County, PA. As a courtesy to SDNY Pretrial Services (PTS), Mr. Brutus is supervised by EDPA PTS.

The modification requested is to the geographic restrictions. Mr. Brutus is currently restricted to the SDNY, EDNY and EDPA. PTS in the EDPA has asked that Your Honor permit Mr. Brutus to travel to other districts and that during periods of such travel, Mr. Brutus' location monitoring may be suspended, both only after approval by Pretrial Services.

Mr. Brutus has progressed to Stage II of the Avenues program. As part of its clinical programming, Avenues takes participants on therapeutic outings. For example, on July 12 there is a planned outing to Island Beach State Park in the DNJ, and on July 19 there is a trip to Hershey Park in the MDPA. The trips are carefully structured and supervised by Avenues staff and designed to support the development of essential life and recovery skills. Avenues believes these therapeutic community experiences are critical for relapse prevention and help bridge the gap between treatment and sustained recovery in the real world.

I have conferred with AUSA Ben Arad, and the Government consents to this request. Mr. Brutus is in between supervising PTS officers in the SDNY. Until an officer is assigned, SDNY PTS Officer Viosanny Harrison has consented on behalf of her office. Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow

cc: AUSA Ben Arad (by email)
SDNY PTS Officer Viosanny Harrison (by email)
EDPA PTS Officer Tamika L. Baxley (by email)
Marisa Wall, Client Care Advocate, Avenues (by email)